

PETER H. AJEMIAN, ESQ., Nevada Bar No. 9491  
[pajemian@bhfs.com](mailto:pajemian@bhfs.com)  
BROWNSTEIN HYATT FARBER SCHRECK, LLP  
100 North City Parkway, Suite 1600  
Las Vegas, NV 89106-4614  
Telephone: 702.382.2101  
Facsimile: 702.382.8135

*Attorneys for Defendants  
Derby Spirits, LLC, Sami Omar,  
and Jeffrey Tomastik*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

SL INTERNATIONAL MANAGEMENT  
COMPANY, INC.,

Plaintiff,

v.

DERBY SPIRITS, LLC; SAMI OMAR;  
and JEFFREY TOMASTIK,

Defendants.

CASE NO.: 2:19-cv-01148-RFB-BNW

**STIPULATION AND [PROPOSED]  
ORDER FOR EXTENSION OF TIME TO  
ANSWER OR RESPOND TO COMPLAINT**

**SECOND REQUEST**

Defendants Derby Spirits, LLC, Sami Omar, and Jeffrey Tomastik ("Defendants"), by and through their counsel of record Peter H. Ajemian, Esq., of the law firm of Brownstein Hyatt Farber Schreck, LLP; and Plaintiff SL International Management Company, Inc., ("Plaintiff") by and through its counsel of record Christian W. Liedtke, of ACUMINIS LLP, and David B. Barney, Esq., of the law firm of Sklar Williams PLLC, hereby stipulate and agree to the following:

1. Plaintiff filed their Complaint on July 1, 2019.
2. Defendants were properly served with the Complaint on July 30, 2019.
3. The current deadline for Defendants to respond to Plaintiff's Complaint is August 30, 2019.
4. The parties hereby stipulate and agree that the deadline for Defendants to answer the Complaint shall be extended by 14 days, until September 13, 2019.
5. This is the second request for an extension of this deadline.

6. This stipulation is made in good faith and is not sought for delay of the court proceedings or any improper purpose. The parties are actively engaged in settlement discussions, have executed a respective NDA, and hope to be able to resolve this dispute without the need for Defendants to answer.

7. Nothing contained herein shall be deemed an admission or waiver of any right belonging to any party hereto.

WHEREFORE, the parties hereby stipulate and respectfully request that the Court enter an Order extending the time for Defendants to answer or otherwise respond to the Complaint up to and including September 13, 2019.

**IT IS SO STIPULATED.**

DATED this 30th day of August, 2019.

BROWNSTEIN HYATT FARBER  
SCHRECK, LLP

BY: /s/ Peter H. Ajemian  
PETER H. AJEMIAN, ESQ.  
Nevada Bar No. 9491  
[pajemian@bhfs.com](mailto:pajemian@bhfs.com)  
100 North City Parkway, Suite 1600  
Las Vegas, NV 89106-4614  
Telephone: 702.382.2101  
Facsimile: 702.382.8135

*Attorneys for Defendants  
Derby Spirits, LLC; Sami Omar;  
and Jeffrey Tomastik*

DATED this 30th day of August 2019.

ACUMINIS LLP

BY: Christian W. Liedtke  
CHRISTIAN W. LIEDTKE  
(admitted *pro hac vice*)  
[cw.liedtke@acuminis.biz](mailto:cw.liedtke@acuminis.biz)  
3420 Bristol Street, 6th Floor  
Costa Mesa, CA 92626

DAVID B. BARNEY, ESQ.  
[dbarney@sklar-law.com](mailto:dbarney@sklar-law.com)  
SKLAR WILLIAMS PLLC  
410 South Rampart Boulevard, Suite 350  
Las Vegas, NV 89145

*Attorneys for Plaintiff SL International  
Management Company, Inc.*

**ORDER**

IT IS SO ORDERED.

September 4, 2019  
DATED: \_\_\_\_\_



UNITED STATES MAGISTRATE JUDGE